

(Del. Rev. 11/14) Pro Se General Complaint Form

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Reginald Holland

---

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Civ. Action No. 23-933   
(To be assigned by Clerk's Office)

Susanne Davidson Jerome,  
Connie Handler and Nicole Evans

---

**COMPLAINT**  
(Pro Se)

Jury Demand?

Yes

No



**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

(Del. Rev. 11/14) Pro Se General Complaint Form

**I. PARTIES IN THIS COMPLAINT****Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Holland, Reginald  
Name (Last, First, MI)

11303 26<sup>th</sup> Avenue South Apt. 1-305  
Street Address

King County, Burien, WA. 98168  
County, City State Zip Code

(206) 514-5467 Telephone Number      brownpennies2020@gmail.com E-mail Address (if available)

**Defendant(s)**

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Jarome, Davidson Susanne  
Name (Last, First)

39 Abbey Lane  
Street Address

New Castle County Newark, DE. 19711  
County, City State Zip Code

Defendant 2:

Handler, Connie  
Name (Last, First)

39 Abbey Lane  
Street Address

New Castle County Newark, DE. 19711  
County, City State Zip Code

(Del. Rev. 11/14) Pro Se General Complaint Form

**Defendant(s) Continued**

Defendant 3:

Evans, Nicole

Name (Last, First)

820 Carvel Dr. Office # A 5

Street Address

Dover, DE. 19901

County, City

State

Zip Code

Defendant 4:

Name (Last, First)

Street Address

County, City

State

Zip Code

**II. BASIS FOR JURISDICTION***Check the option that best describes the basis for jurisdiction in your case:*

- U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

**Toxic Tort / Negligent Infliction of Emotional Distress, "Violation of Delaware Implied Warranty of Habitability." 25 DE Code § 5305 / Reckless Endangerment 11 DE Code § 604.**

(Del. Rev. 11/14) Pro Se General Complaint Form

**III. VENUE**

*This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.*

*Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.*

Venue is appropriate in this Court because:

A substantial part of the events I'm suing about happened in The District of Delaware.

---



---



---



---



---

**IV. STATEMENT OF CLAIM**

Place(s) of occurrence:

Towne Point Apartments 820 Carvel Drive Apt. H-10 / Dover, DE. 19901.

Reginald Holland,

The Plaintiff lived at Towne Point Apartments 820 Carvel Drive APT. H-10 Dover, DE. 19901. From July 29, 2021 thru November, 2021. Reginald Holland became very sick on August 25, 2021.

Date(s) of occurrence: November 8, 2021

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

Plaintiff:

Reginald Holland,

The Plaintiff lived at Towne Point Apartments 820 Carvel Drive APT. H-10 Dover, DE. 19901. From July 29, 2021 thru November, 2021. Reginald Holland, became very sick on August 25, 2021..... weeks After informing Connie Handler, the Regional Property Supervisor of Mid-Atlantic Realty Co., Inc. That the apartment smells like an oil refinery also the plaintiff emailed photos of the old ancient HVAC furnace, located in the bedroom closet that's faulty and defective that's covered with black mold and had fumes seeping from the fittings and connections to the gas meter which is also covered with black mold (plaintiff has photos)...Plaintiff states, "I wasn't even living there 1 complete month yet. And Now I'm Sick." No question that Mid-Atlantic Realty Co., Inc., Is liable for damages and their actions were reckless and created the proximate cause of the plaintiffs, injuries.

What happened to you?

Plaintiff:

(Del. Rev. 11/14) Reginald Holland,

The Plaintiff lived at Towne Point Apartments 820 Carvel Drive APT. H-10 Dover, DE. 19901. From July 29, 2021 thru **November 8, 2021**. Reginald Holland, became very sick on **August 25, 2021**. weeks after informing Connie Handler, the Regional Property Supervisor of Mid-Atlantic Realty Co., Inc. That the apartment smells like an oil refinery also the plaintiff emailed photos of the old ancient HVAC furnace, located in the bedroom closet that's faulty and defective that's covered with black mold and had fumes seeping from the fittings and connections to the gas meter which is also covered with black mold (plaintiff has photos)...Plaintiff states, "**I wasn't even living there 1 complete month yet. And Now I'm Sick.**" No question that Mid-Atlantic Realty Co., Inc., Is liable for damages and their actions were reckless and created the proximate cause of the plaintiffs, injuries.

I respectfully reached out to Nicole Evans the new property manager multiple times informing her of my concerns about how the apartment had black mold and there's an odor of hazardous fumes. I now understand my energy level was failing me. I couldn't do emails as much because I didn't have the strength. I was suffering from lack of concentration. It was 90 degrees outside and I didn't have the concentration to work, so I had to come home and live in an apartment breathing black mold and hazardous fumes... I didn't have the strength to do emails. Majority of the time I needed to call the main office because I felt that I was in an extremely dangerous situation and I needed help fast but that didn't happen.

It was sounding as if she wasn't sure how to handle my complaints .....Nicole Evans, at times would call me back and make comments like "Oh it's been a really busy day. I apologize for hanging up earlier when I had another call."

She continually acted as if she was too busy to talk. I was getting fed up with how the entire situation was starting to unfold. Day after day of informing management of the issues in the apartment. Most of my communication was on the telephone because I wanted immediate action. It was always one thing after another with the maintenance guy. She would tell me he went to home-depot to get supplies or he wouldn't be in because he crashed his motorcycle over the weekend. It was always something...

Was anyone else involved?

I respectfully reached out to Susanne Davidson Jarome, Vice President of Mid-Atlantic Realty Co., Inc. on August 3, 2023. because I was being ignored by Connie Handler, the Regional Property Supervisor of Mid-Atlantic Realty Co., Inc. Before I admitted myself to the hospital she would only respond to my emails by being sarcastic as if she didn't want to be bothered saying she can't decipher what I'm saying. Or she wouldn't respond at all. I was at my wits end. So, When I returned from the hospital I made my mind up to start making arrangements to get away from there as quickly as possible. I was under extremely unsafe and hazardous conditions.

I respectfully reached out to management at the office Nicole Evans. The new property manager sounded if she wasn't sure how to handle my complaints. It was extremely difficult trying to communicate with someone who was a new employee. It seemed that I wasn't getting across to her like everything I would mention was being ignored. Like everywhere I turned everybody was acting sarcastic. She continually would say everything I mentioned to her was being handled by corporate. She started to sound like a recording... **The new property manager was not very knowledgeable so the conversations were not satisfactory so I immediately began reaching out to corporate...** All she would say is, "I'll let the corporate office know the issues and that

(Del. Rev. 11/14) Pro Se General Complaint Form

my emails were being sent to the corporate office." She did reply that maintenance would be there to start doing whatever repairs that needed to be done.

- I made a call on August 3, 2023 at 10:30 am EST to Towne Point Apartments. Nicole Evans expressed the same words a few weeks ago... She always tries to out-talk me or make comments before I can answer. "Like your issues and concerns along with your emails were sent to the corporate office." Then she would place me on hold... On August 26, 2021 the day after I returned from the hospital she was trying to make it difficult for me to get my point across to her; that I had become ill and went to the hospital for medical treatment. I believe that was the first time she hung-up the phone on me... I believe that it happened at least twice between August then into the first or second week of September.

It was extremely difficult trying to communicate with the entire management staff back then, and it's the same way now...During our telephone conversations now I'm able to look back while I was trying to communicate with someone who was a new employee and was handling a very serious situation and acted as if she could care less. It seemed that I wasn't getting across to her or she wasn't handling the situation to my satisfaction...like everything I would mention concerning my complaints she would continually create a pattern that she wasn't going to listen to anything I would say.

Especially, while I was informing her that I had become ill from breathing the black mold and hazardous gas fumes in the apartment had made me sick. She was trying to make it difficult for me to get my point across to her; that I had become ill and went to the hospital for medical treatment. I noticed how she was playing mind games whenever I mention anything concerning my health she would always say someone is on the other line or put me hold. Then make up some reason why she can't talk right now. It was a consistant pattern. It seemed as if management was creating whatever they could to hinder the process of me bringing my concerns to them. Everybody was acting sarcastic. She continually would say everything I mentioned to her was being handled by corporate. There's an extreme lack of professionalism and a touch of trickery when it comes to communication and safety procedures with Mid-Atlantic Realty Co., Inc.

Was an  
else  
involve

I respectfully reached out to Susanne Davidson Jarome, Vice President of Mid-Atlantic Realty Co., Inc. and Connie Handler Regional Property Supervisor of Mid-Atlantic Realty Co., Inc. informing management multiple times concerning how the apartment smelled like an oil refinery and of the presence of mold among many other issues. I sent photos of the mold on the walls and furnace to management. Day after day of informing management of the issues in the apartment. It was always one thing after another with the maintenance guy. They would tell me he went to home-depot to get supplies or he wouldn't be in because he crashed his motorcycle over the weekend. It was always something...

the apartment smelled like an oil refinery and of the presence of mold among many other issues. I sent photos of the mold on the walls and furnace to management. Day after day of informing management of the issues in the apartment. It was always one thing after another with the maintenance guy. They would tell me he went to home-depot to get supplies or he wouldn't be in because he crashed his motorcycle over the weekend. It was always something... I started reaching out to different agencies over and over...I was constantly being pushed away, I wasn't getting anywhere with the hopes of pursuing a claim.I lived at Mid-Atlantic Realty Co., Inc. properties on and off since 1998. So, I reached out to Connie Handler, the Regional Property Supervisor of Mid-Atlantic Realty Co., Inc. When I would continually present the evidence of what I walked into at Towne Point Apartments 820 Carvel Dr. Apt. H-10 / Dover, DE. 19901 She did respond to 2 or 3 of my emails then she stopped answering my emails for a while. Even the new property manager too, now and then they would hang up on me or be rude. I respectfully reached out to Susanne Davidson Jarome, Vice President of Mid-Atlantic Realty Co., Inc. when I was being ignored by Connie Handler, the Regional Property Supervisor of Mid-Atlantic Realty Co., Inc.

7. The problems were unaddressed before I moved into the apartment On July 29, 2021 at Towne Point Apartments 820 Carvel Drive Apt. H-10 / Dover, DE. 19901. I became dizzy and lightheaded for the first month of living there. I became so sick I admitted myself to the hospital on August 25,2021 for mold exposure and breathing toxic fumes. For 60 days later, I couldn't even sleep in the bedroom because that's where the furnace is located. Mid-Atlantic Realty Co., Inc. is liable for causing me to become ill due to a faulty furnace circulating black mold and extremely toxic gas fumes throughout the apartment. It was an extremely hot summer with temperatures exceeding 90 degrees or more... The furnace would shut-off repeatedly throughout the day during the entire time I lived there, especially during the day while the temperatures were exceeding 90 degrees outdoors. Whoever designed these apartments with furnaces in the bedroom didn't exercise a good sense of safety. I witnessed one stressed out maintenance person named Mike. He walked around the complex with a home-depot bucket with tools inside the bucket, trying to fix a situation that required a great deal of repair work. I knew this wasn't going to go well moving forward. The maintenance employee informed me that gases were leaking from the furnace. And that's the odor I've been smelling and breathing all along. He states that the fittings were loose during his repeated attempts to make repairs. He continually came to the apartment 2 or 3 days at a time carrying a home-depot bucket with tools in it... He also states that "apartment H-10 is the 3rd floor unit I lived in...that had been one of the apartments that was hit by a severe windy rain storm that damaged the roof and ceiling prior to me moving in." It's a 3 story apartment building which places my apartment directly under the roof...of course I lived on the 3rd floor.

Who did what?

8. The maintenance guy was always complaining that he had to do all of the repair work by himself. During repeated visits I informed Mike the maintenance guy that during the day I can hear popping and cracking sounds above coming from the ceiling. I told him at night it sounds like someone is walking on the roof because the sounds are much louder than during the daytime. That's when maintenance had informed me that the unit I was living in had been hit by a severe storm before I moved in...The roof was damaged from a windy rain storm and that rain entered the apartment from the roof. Whether or not that happened months ago or a year ago I really don't remember what he stated about when it happened, I just remember that he said that it happened in the apartment I currently lived in at that time Apt. H-10.

My best thinking tells me that's why the furnace doesn't work properly and also why the apartment smells like an oil refinery and is also covered with mold. While he was in the apartment doing repairs inside the 3rd floor unit that was rented to me on July 29th 2021. It surely makes sense because it was quite evident. If rain from a storm had created the problems in the apartment it's likely that moisture and mold could build up around the furnace inside the apartment too. Black mold is evident on the furnace and the surrounding area of drywall. Mold is also present on the gas meter and ceiling where the furnace is located in the bedroom where I slept on and off for 3 months. The apartment smelled like an oil refinery and had an extreme moldy odor. The odor gave me extreme headaches and a nose burning sensation. Having to live with these conditions and continuing to pay my rent which was very embarrassing...I was scared to live there any longer. The furnace continued to be in operation the entire length of time even after I vacated the property on November 8, 2021. Something is really wrong with their communication. During my vacating of the apartment I had to get rid of furniture, clothing and other valuable items like my pool table and fish tank.

Who did what?

9. Even after the bootlegged repairs the entire apartment was in need of professional restoration which no one should have been living in the apartment at all. I continually witnessed one stressed out maintenance person after repeated repair attempts trying to fix a situation that required a great deal of repair work. Yes he made the odor die down somewhat or lessen the fumes from seeping as much but the fumes were still present in the air. It was very evident that the entire apartment had mold issues along with a defective HVAC unit.

10. I tried to obtain building permits from the city of Dover to add credit to my complaint. Unfortunately, all the places that I repeatedly tried to contact concerning me living in an apartment breathing toxic fumes and black mold with the ancient damaged furnace would not give me accurate advice. During this time I was trying to get professional advice concerning what steps or direction I should go in, but everyone seemed to downplay or act very non supportive toward my concerns. I even got up the strength to reach out to a place named Mold Test Company. The person I spoke with on and off for a few days at a time

{Del. Rev. 11/14} Pro Se General Complaint Form

**V. INJURIES**

Due to the reckless actions of Mid-Atlantic Realty Co., Inc. at Towne Point Apartments  
*If you* 820 Carvel Drive Apt. H-10 / Dover, DE. 19901. That management caused Reginald Holland to suffer from health problems, mental issues and emotional distress. Which reveals the continuous sequence of evidence which led to how the plaintiff became extremely sick 27 days after moving to Towne Point Apartments 820 Carvel Drive Apt. H-10 / Dover, DE. 19901.

Plaintiff states, "A few days before I admitted myself to the hospital; I wasn't feeling like my normal self. I was constantly feeling light-headed, tired and having memory problems. Then I started to quickly take notice how this illness made me become unbalanced while I was walking. I immediately became scared, I was constantly feeling

Also to add what this experience has done to my health. Repeatedly making doctors appointments. Now i'm scared because I don't know how my health will affect me in the future...So I'm living in fear.

Currently I have a mental health therapist. I take medication for mental health issues. I have depression and anxiety.

I have repeatedly mentioned to my primary doctors concerning spitting up phlegm and having constant headaches.

**VI. RELIEF**

The relief I want the court to order is:

Money damages in the amount of: (\$70,000)

Other (explain):  
\_\_\_\_\_  
\_\_\_\_\_

The plaintiff seeks relief in the form of a payment in the amount of seventy thousand dollars (\$70,000) Which, shall be used by the plaintiff to restore his misfortunes and damages to his health.

The unfortunate incident that occurred while I was living at: Towne Point Apartments from July 29,2021 thru November 8, 2021.

has caused so much harm to my life in many ways.

My goals and accomplishments have changed over the course of time.

Such a financial set-back for me... I have to start all over again

due to the major life changing circumstances...storage fees,

moving cost, fuel cost, motel fees and replacing furniture and clothing.

On top of paying for housing costs again to fit my budget.

## V. INJURIES

*If you sustained injuries related to the events alleged above, describe them here.*

12. I took notice how management believed a minor repair of 3 or 4 days could resolve a major problem that wasn't addressed before I moved in. I continually witnessed one stressed out maintenance person after repeated repair attempts trying to fix a situation that required a great deal of repair work. Yes he made the odor die down somewhat or lessen the fumes from seeping as much but the fumes were still present in the air. How a maintenance guy could walk around the complex with a home-depot bucket with tools inside it to resolve a major problem... Mold restoration and structural damage is a lengthy process where no one should be living inside until the remediation is done. I wasn't going to continue being frustrated trying to solve or figure out a problem with Mid-Atlantic Realty Co., Inc. that should have never happened in the first place.

13. The plaintiff state's "My life had already been damaged and my health had already been affected by the negligence before the bootlegged repair attempts." If management had never rented the uninhabitable apartment that was unfit for

VI. living in the first place. The plaintiff trusted and believed that Mid-Atlantic Realty Co., Inc. has been in operation for many decades and should ultimately know their responsibility for keeping every rental property they own in a habitable condition and should be completely fit for living before he moved in. 25 DE Code



Other (explain):

14. It appeared that Mid-Atlantic Realty Co., Inc., was not concerned about the plaintiff living in a moldy environment and the effects it has had on his health while living on their property in one of their rental units. The plaintiff suffered over 100 days breathing toxic black mold and hazardous fumes for a long period of time. I was very sick for 3 weeks from the negligence of Mid-Atlantic Realty Co., Inc. Today, I continue to suffer from emotional distress, mental depression, irritating eyes, headaches and spitting up phlegm. I continued to live there until November 8, 2021. They gave me back my security deposit.

Mid-Atlantic Realty Co., Inc. Demonstrated extremely poor judgement based on the evidence that took place. Then made the decision not to perform a mold restoration and remediation process or conduct a HVAC system check to prevent issues like this in the first place, before the plaintiff moved in... Also made the decision to rent Reginald Holland, an apartment that was unfit for living in after being destroyed by a severe rain and wind storm, which was told to the plaintiff by the maintenance person named Mike. The bedroom is the location were that old ancient damaged or (defective) hvac furnace was located in the rear bedroom at 1820 Carvel Drive APT. H-10 that is used to heat and cool the apartment...Also the plaintiff threw away lots of clothing and furniture due to the mold exposure at the apartment.



brownie boy &lt;brownpennies2020@gmail.com&gt;

---

**VI. RELIEF / Continued... Plaintiff: Reginald Holland**

1 message

**brownie boy <brownpennies2020@gmail.com>**  
To: brownie boy <brownpennies2020@gmail.com>

Fri, Aug 18, 2023 at 5:42 AM

**VI. RELIEF / Continued****The relief I want the court to order is:**

The plaintiff seeks relief in the form of a payment in the amount of Seventy Thousand Dollars (\$70,000). Which shall be used by the plaintiff to restore his misfortunes and damages to his health.

**Money damages in the amount of: \$70,000.****Other (explain):**

**The unfortunate incident that occurred while I was living at: Towne Point Apartments 820 Carvel Drive Apt. H-10 / Dover, DE. 19901, from July 29,2021 thru November 8, 2021 , Has caused so much damage to my life in many ways.**

**My goals and accomplishments have changed over the course of time. It's been such a financial set-back for me... I have to start all over again due to the major life changing circumstances...storage fees, moving cost, fuel cost, motel fees and replacing furniture and clothing. On top of paying for housing costs again to fit my budget.**

**Also, to add what this experience has done to my health. Repeatedly making doctors appointments. Now I'm scared because I don't know how the dangers I have suffered from and lived with may affect my health and life in the future...So everyday I'm living in fear.**

**Currently I have a mental health therapist. I take medication for mental health issues. I have depression and anxiety. I have repeatedly mentioned to my primary doctors concerning spitting up phlegm and having constant headaches.**

**Before I was hospitalized, on August 25, 2021.**

I expressed this to Connie Handler Regional Property Supv. for Mid-Atlantic Realty Co., Inc. in an email dated: Aug 11th 2021  
I attached the email to my complaint. Titled "The Third Report"

**Before I was admitted to the hospital:**

I stated to Connie Handler, in an email on Aug 11th 2021...

"I may even end up having health issues due to all the hazardous fumes I'm breathing." I can't believe what I've been introduced to. It saddens me deeply that had I known this, I would have changed my mind about living here. I also re-sent the same email again on August 20, 2021. Because management stopped answering my emails. I have the forwarded emails.

That made me very frustrated on top of cleaning a refrigerator with roaches in it. Where food had soaked into the trimming of the refrigerator and turned into a nasty sludge from prior tenants who lived there before I moved-in... photos are available.

I was afraid to put food into the refrigerator. I have (photos of the refrigerator) that I sent to management about how disgusting of a situation they put me in. I had so much cleaning to do...The windows in the apartment were extremely filthy and nasty.

Crickets in the bathroom.

The crawl space behind the bathtub someone stored trash in the crawl space that was there before I moved in. I have (photos of the filthy crawl space). It's so much that I walked into it's very painful and heartbreaking. It was the first time something like this had ever happened to me.

They put a new carpet down before I moved in. That really tricked me. So, of course that makes your new place look good. That night of July 29, 2021 the day that I had moved in I went out to buy something to eat. When I returned roaches were everywhere.

If I was aware of the uninhabitable conditions before I moved there I would have changed my mind.

I didn't know that roaches were in the refrigerator... I didn't travel with any food during my move because the temperature was in the 90's. It was an extremely hot summer.

**So, I didn't discover the roaches until that night or maybe even into the next day after I moved in. I didn't know that the refrigerator was over 20 years old until I saw someone had placed the date on it with black magic marker (photos are available).**

**I didn't know the electrical receptacles were upside down behind the refrigerator (photos are available).**

**Who does this to a new tenant? or any tenant for that matter...**

**Now add all this up with me living with black mold and breathing hazardous and toxic fumes. In almost triple digit temperatures with a HVAC air conditioning unit that doesn't work properly for over 100 days..**

**I respectfully ask the court to please see that I'm treated fairly.**

**The plaintiff requests that this claim be held for trial by jury.**

**Sincerely,  
Reginald Holland**



Virus-free.www.avast.com

## VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

August 17, 2023  
Dated

Dated

Reginald Hallard  
Plaintiff's Signature

Plaintiff's Signature

Holland, Reginald  
Printed Name (Last, First, MI)

**Printed Name (Last, First, MI)**

11303 26<sup>th</sup> Avenue South Apt. 1-305 Burien, WA. 98168

(206) 514-5467  
Telephone Number

(206) 514-5467  
Telephone Number

brownpennies2020@gmail.com  
E-mail Address (if available)

*List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.*

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**